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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 846)

ANDREA SANDERLIN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID LEE, being duly sworn, deposes and states that he is a Special Agent with the United States Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about May 20, 2013, within the Eastern District of New York and elsewhere, defendant ANDREA SANDERLIN, together with others, did knowingly and intentionally conspire to manufacture, distribute and possess with intent to distribute 1,000 or more marijuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 846).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I have been a Special Agent with DEA for 27 years. My information in this case comes from a review of records from the DEA, the Department of Homeland Security, Homeland Security Investigations ("HSI") and the New York Police Department ("NYPD"), interviews and conversations with witnesses and other law enforcement officers, and my own participation in this investigation.

2. In or about April 2013, a confidential witness ("CW-1")^{2/} informed law enforcement agents that an individual named "Andi" operated at least one marijuana grow house in Brooklyn or Queens, New York. CW-1 further informed the agents that "Andi" lived in Scarsdale, New York and drove a Mercedes Sport Utility Vehicle ("SUV").

3. Later in April 2013, law enforcement agents showed CW-1 a photograph of ANDREA SANDERLIN, which CW-1 positively identified as "Andi." Law enforcement agents identified two separate addresses for SANDERLIN in Scarsdale.

4. Law enforcement agents also discovered that SANDERLIN currently has at least three vehicles registered in her name: (1) a gray 2010 Mercedes GL4 SUV; (2) a

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

^{2/} CW-1 has been charged in an Indictment with participating in a conspiracy to possess and distribute marijuana. CW-1's information to date has proven reliable and has been corroborated by, among other things, the investigation described below.

black 2004 Jeep Liberty; and (3) a white 2005 Chevrolet van. Each of those vehicles were registered to one of SANDERLIN's addresses in Scarsdale.

5. Through a review of insurance claims on the vehicles registered in her name, law enforcement agents obtained a telephone number for SANDERLIN. Some of those insurance claims also listed an address for SANDERLIN in Manhattan, New York.

6. On May 8, 2013, law enforcement agents contacted Con Edison regarding electric accounts under SANDERLIN's name or telephone number. Con Edison provided information on an account associated with SANDERLIN's telephone number in the name of "Fantastic Enterprises" at 58-15 57th Drive, Maspeth, Queens, New York ("58-15 57th Drive"). Representatives of Con Edison advised law enforcement agents that the location was using an unusually high amount of electricity. Con Edison further advised that bills for 58-15 57th Drive were paid in cash.

7. Law enforcement agents learned that "Fantastic Enterprises" was registered as a New York State Corporation from 2007 to 2011. The address provided for "Fantastic Enterprises" was the address in Manhattan listed on SANDERLIN's insurance claims.

8. On May 13, 2013, agents observed the gray Mercedes SUV registered to SANDERLIN leave her residence in Scarsdale and travel over the Robert F. Kennedy Bridge into Queens. Later that day, agents observed the same gray Mercedes SUV parked in the garage of 58-15 57th Drive and, sometime later, observed the gray Mercedes SUV leave that garage.

9. On May 14, 2013, law enforcement agents observed the white Chevrolet van registered to SANDERLIN drive into the garage at 58-15 57th Drive and observed the garage come down.

10. On May 15, 2013, law enforcement agents observed the gray Mercedes SUV registered to SANDERLIN leave the garage at 58-15 57th Drive. As the Mercedes SUV left the garage, law enforcement agents identified SANDERLIN as the driver.

11. On May 17, 2013, law enforcement agents observed the gray Mercedes SUV registered to SANDERLIN leave the garage of 58-15 57th Drive. As the Mercedes SUV left the garage, law enforcement agents identified SANDERLIN as the driver. Law enforcement agents then trailed SANDERLIN to her residence in Scarsdale and saw her enter the location.

12. On May 20, 2013, law enforcement agents observed the Mercedes SUV leave SANDERLIN's residence and drive to 58-15 57th Drive. As the Mercedes SUV neared 58-15 57th Drive, law enforcement agents stopped the SUV and identified themselves. The driver of the SUV was identified as SANDERLIN.

13. SANDERLIN was brought to the front of 58-15 57th Drive and, when told by law enforcement agents that they were going to enter that location, SANDERLIN, in sum and substance, confirmed that the warehouse was hers and declined to provide law enforcement agents with her consent to enter the location.

14. Law enforcement agents entered 58-15 57th Drive pursuant to a search warrant and discovered a warehouse containing a sophisticated operation to grow and process

marijuana. Agents discovered two separate rooms constructed within the warehouse designed to grow marijuana. Each room contained state of the art lighting, irrigation and ventilation systems to facilitate growing the marijuana. Between the two rooms, law enforcement agents seized more than 1,000 marijuana plants and large quantities of dried marijuana.

WHEREFORE, your deponent respectfully requests that defendant ANDREA SANDERLIN be dealt with according to law.



David Lee
Special Agent, DEA

Sworn to before me this
20th day of May, 2013

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK